U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 22, 2016

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DOCUMENT
ELECTRONICALLY FILED
DOC #:________________
DATE FILED: 12/01/2016

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
40 Foley Square
New York, New York 10007

Re: United States v. Danel Gonzalez, et al., S4 16 Cr. 175 (LGS)

Dear Judge Schofield:

Pursuant to the Court's November 17, 2016 order, the parties[1] write jointly to propose a schedule for discovery, the filing of motions, and dates for a status conference. The Government expects to produce Rule 16 discovery to the defense on a rolling basis, to be completed by December 15, 2016. The parties propose that defense motions be due by February 15, 2017; that Government responses be due by March 1, 2017; and that defense replies be due by March 10, 2017. The parties are available for a status conference on March 27, 28, or 29, 2017.

The Government requests that time under the Speedy Trial Act be excluded from November 22, 2016 through the date of the status conference, pursuant to 18 U.S.C. § 3161(h)(7)(A). The Government submits that the ends of justice are served by this exclusion of time so that the Government may produce discovery, the defense may review discovery and contemplate any motions, and so that the parties may discuss a disposition. Defense counsel consents to the exclusion of time.

Respectfully submitted,

PREET BHARARA
United States Attorney for the
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Application Granted. Discovery shall be completed by December 15, 2016. Defendants' motion(s) shall be filed by February 15, 2017. The Government's response shall be filed by March 1, 2017. Defendant's reply shall be filed by March 10, 2017. The parties shall appear for a status conference on April 4, 2017 at 10:40 a.m. For the reasons stated above, the Court finds that the ends of justice served by excluding the time between today and April 4, 2017 outweigh the best interests of the public and the Defendants in a speedy trial as provided in 18 U.S.C. 3161(h)(7)(A). It is hereby ORDERED that the time between today and June 14, 2016 is excluded.

Dated: December 1, 2016
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE